

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
)	No. 08 CR 437
v.)	
)	Judge Matthew F. Kennelly
)	
MAURICE BELL)	
)	

AGREED MOTION TO MODIFY CONDITIONS OF RELEASE

Maurice Bell, defendant herein, by and through his attorney, Gary Ravitz, moves to modify the conditions of release, and in support states the following:

1. Mr. Bell's current pretrial release order restricts his travel to the states of Illinois and Arizona. However, his employer requires him to travel from time to time to conduct its business or attend training in other states.
2. We request that the pretrial order be modified to include "employment related travel with advance permission of Pretrial Services."
3. The above-quoted language is suggested by AUSA Gillers, who has personally conferred with Mr. Bell's Pretrial Services Officer in Arizona. Mr. Bell agrees to the proposed modification.
4. Accordingly, because the parties are in agreement, they request the Court to grant this motion without requiring their appearance.

WHEREFORE, Maurice Bell respectfully moves for entry of an order modifying the conditions of pretrial release.

Respectfully submitted,

s/ Gary Ravitz

Gary Ravitz, attorney for Maurice Bell

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